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Attorney for Material Witness: MARTIN SANCHEZ CAMPOS
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8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA
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12 UNITED STATES OF AMERICA,) Case No.: 07 CR 3353 JM
13)
Plaintiff,) NOTICE OF MOTION AND MOTION FOR
14 vs.) VIDEOTAPE DEPOSITION AND REQUEST
15) FOR STATEMENT OF REASONS IN
JOSE HEREDIA-GUZMAN, JUAN CARLOS) SUPPORT OF CUSTODY
16 VASQUEZ-MENDOZA, RAMON) DATE: January 15, 2008
GALLARDO-SAMANO,) TIME: 9:30 a.m.
17) DEPT: Magistrate Stormes
Defendants.
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19 PLEASE TAKE NOTICE that on September 15, 2008 at 9:30 a.m. or as soon thereafter
20 as counsel may be heard, material witness MARTIN SANCHEZ CAMPOS (hereafter "Material
21 Witness") by and through his counsel, Wayne C. Mayer will bring a motion for a court order to
22 take the Material Witness' videotaped deposition.

23 **MOTION**

24 Material Witness, pursuant to Federal Rules of Criminal Procedure, Rule 15, and Title 18
25 U.S.C. sec. 3144, hereby moves this court for an order to take his deposition by videotape and
release him at the conclusion of the deposition. If the Court denies this motion, then Material

1 Witness further requests the United States Attorney's office provide the witness with a Statement
2 of Reasons in Support of Custody in accordance with Federal Rules of Criminal Procedure, Rule
3 46(g).

4 This motion is based upon this Notice of Motion and Motion for Videotaped Deposition
5 and Request for Statement of Reasons in Support of Custody, Points and Authorities in Support
6 Martin Sanchez Campos' Motion for Video Taped Deposition, Declaration of Martin Sanchez
7 Campos, Declaration of Wayne C. Mayer, the files and records in the above entitled cause, and
8 any and all other information brought to the Court's attention prior to or during the hearing on
9 this motion.
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11 Dated: December 21, 2007

Respectfully submitted,

13 s/ Wayne C. Mayer
14 Wayne C. Mayer
15 Attorney for Material Witness
16 MARTIN SANCHEZ CAMPOS
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